

Objection Deadline: July 1, 2019, 4:00 p.m. EST

Hearing Date: July 11, 2019, 10:00 a.m. EST

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

SEARS HOLDINGS CORPORATION,
et al.,

Debtors.

Chapter 11

Case No.: 18-23538 (RDD)
Jointly Administered

**AMENDED NOTICE OF HEARING ON THE MOTION OF
MOTION FOR RELIEF FROM AUTOMATIC STAY BY STEVEN R. WOLF, ESQ., AS
ADMINISTRATOR OF THE ESTATE OF BREANNA N. AFRICA, DECEASED, AND
CARMINE MOLINARO, JR. AND COLETTE MOLINARO, AS PARENTS AND
NATURAL GUARDIANS OF MCKENZIE MOLINARO, A MINOR**

PLEASE TAKE NOTICE that a hearing on the previously-filed motion (the “Motion”) [Dkt No. 2961], dated March 26, 2019, of Steven R. Wolf, as Administrator of the Estate of Breanna N. Africa, deceased, and Carmine Molinaro, Jr. and Colette Molinaro, as Parents and Natural Guardians of McKenzie Molinaro, a minor (collectively, “Movants”), by their counsel Tershel & Associates, Law Office of Clark A. Mitchell, and Montgomery McCracken Walker & Rhoads LLP, for an order granting relief from the automatic stay pursuant to section 362(d) of the Bankruptcy Code, will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601 on July 11, 2019 at 10:00 a.m., or as soon thereafter as counsel may be heard.¹

¹ The Motion was originally filed on March 26, 2019 [Dkt No. 2961] and noticed for the April 18, 2019 hearing [Dkt No. 2962]. After being informed by Debtors’ counsel that an Inquiry (as defined in the *Order Approving Procedures For Modification Of The Automatic Stay Under Certain Circumstances*) must be submitted requesting stay relief before a hearing can be held on the Motion, the Movants submitted such Inquiries on April 9, 2019. As a consensual resolution has not been reached, the Movants are seeking a hearing on the Motion.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion must be made in writing, filed with the Court electronically in accordance with General Order M-399 by registered users of the Court's electronic case filing system and, by all other parties in interest, mailed to the Clerk of the United States Bankruptcy Court, 300 Quarropas Street, White Plains, NY 10601-4140, on a compact disc, in text-searchable portable document format (PDF) (with two hard copies delivered directly to the Chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, 300 Quarropas Street, White Plains, NY 10601-4140), and served in accordance with General Order M-399 or other form upon: (i) Edward L. Schnitzer, Esq., Montgomery McCracken Walker & Rhoads LLP, 1330 Avenue of the Americas, 14th Floor, New York, New York 10019, (ii) Jarrod T. Takah, Esq., Tershel & Associates, 55 South Main Street, Washington, Pennsylvania 15301, (iii) Clark A. Mitchell, Esq., Law Office Of Clark A. Mitchell, 17 S. College Street, Washington, Pennsylvania 15301, and (iv) Office of The United States Trustee, Attn: Paul Schwartzberg, Richard Morrissey, 201 Varick St. Ste. 1006, New York, NY 10014, so as to be actually received no later than July 1, 2019.

Dated: June 21, 2019
New York, New York

**MONTGOMERY MCCRACKEN WALKER &
RHOADS LLP**

By: /s/ Edward L. Schnitzer
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Counsel for the Movants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing instrument has been served on this 21st day of June, 2019 upon (a) all parties requesting service via ECF notification and (b) all parties identified in the Master Service List as of 6/11/2019 available at <https://restructuring.primeclerk.com/sears/Home-Index>.

/s/ Edward L. Schnitzer

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